

**PHMSA UNDERGROUND NATURAL GAS STORAGE (UNGS)  
TX RRC PROGRAM EVALUATION – CY2022  
CONDUCTED 3/20-25/2023**

<b>A – PROGRESS REPORT AND PROGRAM DOCUMENTATION REVIEW</b>	<b>9 of 9</b>
<b>B – PROGRAM INSPECTION PROCEDURES</b>	<b>13 of 13 (14)</b>
<b>C – PROGRAM PERFORMANCE</b>	<b>27 of 27 (34)</b>
<b>D – COMPLIANCE ACTIVITIES</b>	<b>21 of 21</b>
<b>E – INCIDENT INVESTIGATIONS</b>	<b>5 of 5 (13)</b>
<b>F – DAMAGE PREVENTION</b>	<b>4 of 4</b>
<b>G – FIELD INSPECTIONS</b>	<b>12 of 12</b>
<b>H - 60106 AGREEMENT STATE (if applicable)</b>	<b>0 of 0 (6)</b>
<b>TOTAL PROGRAM EVALUATION POINTS</b>	<b>91 of 91 (113)</b>

## PHMSA UNGS STATE PROGRAM EVALUATION – CY2022

<b>A – PROGRESS REPORT AND PROGRAM DOCUMENTATION REVIEW</b> <b>THIS SECTION ANALYZES ACCURACY AND COMPLETENESS OF ANNUAL PROGRESS REPORT</b>		SCORE
1	Accuracy of Jurisdictional Authority and Operator/Inspection Units Data – Progress Report Attachment 1 (Yes= 1 point, No= 0 Points, NI=.5 point) <b>Comments: Yes. Attachment 1 in in agreement with Attachments 3 &amp; 8 and with TRC rules and laws.</b>	1
2	Review of Inspection Days for accuracy – Progress Report Attachment 2 (Yes= 1 point, No= 0 Points, NI=.5 point) <b>Comments: Yes. The 44 days agrees with TRC records.</b>	1
3	Accuracy verification of Operators and Operators Inspection Units in State – Progress Report Attachment 3 (Yes= 1 point, No= 0 Points, NI=.5 point) <b>Comments: Yes. Attachment 3 is consistent with TRC records.</b>	1
4	Accuracy verification of Compliance Activities – Progress Report Attachment 5 (Yes= 1 point, No= 0 Points, NI=.5 point) <b>Comments: Yes. Attachment 5 records are electronic and were accessible during the Evaluation.</b>	1
5	Were UNGS program files well-organized and accessible? - Progress Report Attachment 6 (Yes= 2 points, No=0 Points, NI=1 point) <b>Comments: Yes. The electronic records were readily available and Mark was skilled at accessing them.</b>	2
6	Was employee listing and completed training accurate and complete? – Progress Report Attachment 7 (Yes= 1 point, No= 0 Points, NI=.5 point) <b>Comments: Yes. All individuals involved with UNGS have taken all three required Courses.</b>	1
7	Verification of Part 192 and 199 Rules and Amendments – Progress Report Attachment 8 (Yes= 1 point, No= 0 Points) <b>Comments: Yes. TRC is fully compliant with the items listed in Attachment 8.</b>	1
8	List of Planned Performance - Did State describe accomplishments on Progress Report in detail – Progress Report Attachment 10 (Yes= 1 point, No= 0 Points, NI=.5 point) <b>Comments: Yes. Acceptable for this first year. Strongly recommended increased emphasis on UNGS plans and activities in the future.</b>	1
9	<b>General Comments: TRC Chairman: The Honorable Christi Craddick, 1701 N Congress Ave, Austin, TX 78701. Mark Lay, UNGS Program Manager, Mark.Lay@rrc.texas.gov, 512-971-3096. UNGS PROGRESS REPORT REVIEW score is 50 of 50: Highest percentage of inspectors is in categories I &amp; II. No UNGS incidents in 2022, and none identified in recent memory. Part A scored 9 of 9 points.</b>	9

<b>B – PROGRAM INSPECTION PROCEDURES</b> Does State Inspection Plan include procedures that address the following elements? (See Guidelines Section 5.1)		
1	<p>Does State have written inspection procedures?(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. They were developed from, and added into, the Gas &amp; HL Procedures.</b></p>	2
2	<p>Standard Inspections</p> <p>Do Standard Inspection procedures give guidance to State inspectors that insure consistency for inspections conducted by the State? The following elements should be addressed at a minimum. (Review of Procedures, Records, or Field Items to complete a PHMSA UNGS IA Question Set (RESERVOIR or CAVERN) – 2019.12.31)</p> <ul style="list-style-type: none"> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> <li>• Post Inspection Activities</li> </ul> <p>(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. See Standard Operating Guidelines (SOG) Sections 3.8.1-3.8.1.5 for detail guidance.</b></p>	2
3	<p>Integrity Management Inspections</p> <ul style="list-style-type: none"> <li>• Do Integrity Management Inspection procedures give guidance to State inspectors that insure consistency for inspections conducted by the State? The following elements should be addressed at a minimum. (Integrity Testing and Maintenance: Observing Integrity Testing (Tubing, Casing, Cement), reservoir integrity monitoring, &amp; FLIR Camera inspections.)</li> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> </ul> <p>Post Inspection Activities(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. UNGS Integrity Management is inherent in the UNGS Standard Inspection in IA. See Standard Operating Guidelines (SOG) Sections 3.8.1-3.8.1.5 for detail guidance. Background knowledge of Integrity Management is known. Also see Standard Operating Guidelines (SOG) Section 7.1. for reference. Discussed that FLIR Camera inspections are not required of Operators.</b></p>	2
4	<p>Design, Testing, and Construction Inspections</p> <p>Do Design, Testing, and Construction Inspection procedures give guidance to State inspectors that insure consistency for Inspections conducted by the State? The following elements should be addressed at a minimum. (Review of procedures, records, and field activities to complete PHMSA UNGS IA Question Set (RESERVOIR or CAVERN CONSTRUCTION) – 2019.12.31. Inspection activities for well design, drilling and completion activities, well workover, reservoir maintenance/repair activities, and abandonment (Plugging and cementing), temporary abandonment, and restoration.)</p> <ul style="list-style-type: none"> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> <li>• Post Inspection Activities</li> </ul> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. See Standard Operating Guidelines (SOG) Section 7.6 for detail guidance. Discussed amending 7.6.3.1 to give specific guidance concerning well workover, reservoir maintenance/repair activities, and abandonment activities.</b></p>	1

5	<p><b>Wellhead Inspections</b></p> <p>Do Wellhead Inspection procedures give guidance to State inspectors that insure consistency for Inspections conducted by the State? The following elements should be addressed at a minimum.</p> <ul style="list-style-type: none"> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> <li>• Post Inspection Activities</li> </ul> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. Wellhead Inspections are included in the Standard Inspection.</b></p>	NA
6	<p><b>Drug and Alcohol Inspections</b></p> <p>Do Drug and Alcohol Inspection procedures give guidance to State inspectors that insure consistency for Inspections conducted by the State? The following elements should be addressed at a minimum. (Using AI to complete the federal Comprehensive Drug and Alcohol program (Form 3.1.11). Includes time conducting joint inspections with other agencies for this type of inspection.)</p> <ul style="list-style-type: none"> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> <li>• Post Inspection Activities</li> </ul> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. See Standard Operating Guidelines (SOG) Sections 3.8.1-3.8.1.5 for detail guidance, Specifically 3.8.1.5 &amp; 7.4.</b></p>	1
7	<p>Does inspection plan address inspection priorities of each inspection unit, based on the following elements?</p> <ul style="list-style-type: none"> <li>• Length of time since last inspection (Within five-year interval per inspection unit)</li> <li>• Operating history of operator/unit and/or location (includes leakage, incident, Integrity Testing, and compliance activities)</li> <li>• Type of activity being undertaken by operators in inspection units (i.e. construction)</li> <li>• Locations of operator's inspection units being inspected - (Geographic area, Population Density, etc.)</li> <li>• Process to identify high-risk inspection units considering integrity threats</li> </ul> <p>Are inspection units broken down appropriately?(Yes= 5 points, No= 0 Points, NI=1-4 points)</p> <p><b>Comments: Yes. See Standard Operating Guidelines (SOG) Section 3.8.3. Recommended to specify geological threat, population density, road encroachment, etc inside 'external threats'.</b></p>	5
8	<p><b>General Comments: Part B scored 13 of 13 points.</b></p>	13

C – PROGRAM PERFORMANCE		
1	<p>Was ratio of Total Inspection Person-Days to Total Person-Days acceptable? (Chapter 4.2)</p> <p><b>A = Total Inspection Person Days (Attachment 2)</b>  <b>B = Total Inspection Person Days Charged to the program</b>  <b>(220 x Number of Inspection person years from Attachment 7)</b>  <b>Ratio = A/B      If Ratio &gt;= .38 then score = 5 points. If Ratio &lt; .38 then score = 0 points.</b>  <b>(Yes= 5 points, No= 0 Points)</b>  <b>Comments: Yes. .2*220=44; 44 field days; 44/44=1.0&gt;.38 okay.</b></p>	5
2	<p>Has each Inspector and Program Manager fulfilled the TQ Training Requirements? (See Guidelines Appendix C for requirements and Chapter 4.3.1) (Yes= 5 points, No= 0 Points, NI=1-4) <b>Comments: Yes. Two inspectors and the Program manager has completed the TQ Training for UNGS.</b></p>	5
3	<p>Does State use the PHMSA Inspection Assistant (IA) program to document inspections? (Yes= 2 points, No= 0 Points, NI=1 point) <b>Comments: Yes. IA is used and were verified in IA.</b></p>	2
4	<p>Did records and discussions with Program Manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 (Yes= 2 points, No= 0 Points, NI=1 point) <b>Comments: Yes. Stephanie Weidman is the Program manager of record.</b></p>	2
5	<p>Did State respond to PHMSA's Evaluation Letter within 60 days and correct or address any noted deficiencies? Chapter 8.1 (Yes= 2 points, No= 0 Points, NI=1 point) <b>Comments: NA. 2022 was the first of the TRC/PHMSA UNGS Partnership.</b></p>	NA
6	<p>Did State inspect all types of operators and inspection units in accordance with time intervals established in their written procedures? Chapter 5.1 (Yes= 5 points, No= 0 Points, NI=1-4 points) <b>Comments: Yes. TRC has specified a 4-year inspection frequency for all UNGS Inspections. See Standard Operating Guidelines (SOG) Section 3.8.</b></p>	5
7	<p>Did State Inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Chapter 5.1 (Yes= 2 points, No= 0 Points, NI=1 point) <b>Comments: Yes. TRC uses IA and all applicable modules were selected.</b></p>	2
8	<p>Did State complete all applicable portions of inspection forms? (Yes= 2 points, No= 0 Points, NI=1 point) <b>Comments: Yes. Review of several inspections in IA showed that all questions were addressed.</b></p>	2
9	<p>Has the State reviewed Operator Annual reports, along with Incident reports, for accuracy and analyzed data for trends and operator issues? (Yes= 2 points, No= 0 Points, NI=1 point) <b>Comments: NA. First year of the partnership was 2022 and the annual reports were only received last week. Recommended that the review should be done/supervised by Mark Lay. A procedure for the review should be established.</b></p>	NA

10	<p>Is the State verifying operators are conducting drug and alcohol tests required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199</p> <p>(Yes= 2 points, No= 0 Points, NI= 1 point)</p> <p><b>Comments: Yes. There is a question in IA that addresses this, and a Field D&amp;A is usually done.</b></p>	2
11	<p>Does the State have a mechanism for communicating with stakeholders regarding the inspection and enforcement program? (This should include making enforcement cases available to public).</p> <p>(Yes= 1 points, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. TRC has a Web Site that can be accessed by the public. Recommended that Mark and Justin get on the Web Site and see what they can find. Had a UNGS breakout track during the annual TRC Regulatory Conference.</b></p>	1
12	<p>Did State execute appropriate follow-up actions to Safety Related Condition Reports (SRCR)? Chapter 6.3</p> <p>(Yes= 1 points, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. No SRCR in UNGS.</b></p>	NA
13	<p>Did the State participate in/respond to surveys or information requests from PHMSA?</p> <p>(Yes= 1 points, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. No UNGS requests were received in 2022. TRC is willing to participate in requests or surveys.</b></p>	NA
14	<p>Did the State forward any potential waivers/special permits to PHMSA for review prior to issuing them to operators?</p> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: YES. One was received, it was forwarded to PHMSA, and it was dropped by the Operator.</b></p>	1
15	<p>If the State has issued any waivers/special permits for any operator, has the State verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.</p> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. none for UNGS.</b></p>	NA
16	<p><b>General Comments: Part C scored 27 of 27 points.</b></p>	27

D – COMPLIANCE ACTIVITIES		
1	<p>Does the State have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1</p> <ul style="list-style-type: none"> <li>• <b>Procedures to notify an operator (company officer) when a noncompliance is identified (60105 States)</b></li> <li>• <b>Procedures to routinely review progress of compliance actions to prevent delays or breakdowns</b></li> <li>• <b>Procedures regarding closing outstanding probable violations</b></li> </ul> <p>(Yes= 4 points, No= 0 Points, NI=1-3 points)  <b>Comments: Yes. See Standard Operating Guidelines (SOG) Section 5.</b></p>	4
2	<p>Did the State follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1</p> <ul style="list-style-type: none"> <li>• Were compliance actions sent to company officer or manager/board member if municipal/government system (60105 States)?</li> <li>• Document probable violations</li> <li>• Resolve probable violations</li> <li>• Routinely review progress of probable violations</li> </ul> <p>(Yes= 4 points, No= 0 Points, NI=1-3 points)  <b>Comments: Yes. The ETC Bammel inspection was reviewed and the Plan of Correction (POC) is in process.</b></p>	4
3	<p>Did State within 30 days of the end of an inspection conduct a post-inspection briefing with the owner or operator of the UNGS facility inspected outlining any concerns identified during the inspection?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. Per Standard Operating Guidelines (SOG) Section 3.8.1.4 &amp; 3.8.1.5, An Executive Closing Summary is generated by the Lead inspector on the last day of the inspection. It reports either no violations found or presents the possible violations. Concerns are usually not used in the TRC.</b></p>	2
4	<p>Did State within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. The Executive Closing Summary serves as the preliminary written notice, and the Formal notice of Violations is sent within 30 days.</b></p>	2
5	<p>Did the State issue compliance actions for all probable violations discovered (60105 States)?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. One violation was found in the ETC Bammel inspection and that violation is addressed in the POC.</b></p>	2
6	<p>Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary (60105 States).</p> <p>(Yes= 2 points, No= 0 Points)  <b>Comments: Yes. The SOG processes are being followed, see SOG Sections 5 &amp; 12.</b></p>	2

7	<p>Is the Program Manager familiar with State process for imposing civil penalties (60105 States)? (describe any actions taken)</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. Mark has displayed full knowledge of TRC Processes for any issues of Compliance including civil penalties.</b></p>	2
8	<p>Were civil penalties considered for repeat violations, violations which can't be corrected by other means, or violations resulting in incidents (60105 States)? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. No such violations have been found in this new UNGS Program, the violation found was considered for civil penalty and a penalty was unnecessary.</b></p>	2
9	<p>Can the State demonstrate it is using their enforcement fining authority for safety violations (60105 States)? (Yes= 1 point, No= 0 Points, NI= .5 point)</p> <p><b>Comments: Yes. The Program Manager is familiar with the State process. TRC has issued several penalties for Gas, HL, and Damage Prevention.</b></p>	1
10	<b>General Comments: Part D scored 21 of 21 points.</b>	21



E – INCIDENT INVESTIGATIONS		
1	<p>Does the State have written procedures to address State actions in the event of an incident? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. See Standard Operating Guidelines (SOG) Sections 8 and 9.</b></p>	2
2	<p>Does State have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. The 24 hour contact number is 844.773.0305, and TRC has access to NRC reports.</b></p>	2
3	<p>Did the State keep adequate records of Incident notifications received? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: NA. There have been no UNGS incidents. The process is in place.</b></p>	NA
4	<p>If onsite investigation was not made, did State obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 (Yes= 1 point, No= 0 Points, NI= .5 point)</p> <p><b>Comments: NA. There have been no UNGS incidents. The process is in place.</b></p>	NA
5	<p>Were all incidents investigated, thoroughly documented, and with conclusions and recommendations?</p> <ul style="list-style-type: none"> <li>• <b>Observations and document review</b></li> <li>• <b>Contributing Factors</b></li> <li>• <b>Recommendations to prevent recurrences where appropriate</b></li> </ul> <p>(Yes= 3 points, No= 0 Points, NI=1-2 points)</p> <p><b>Comments: NA. There have been no UNGS incidents. The process is in place.</b></p>	NA
6	<p>Did the State initiate compliance action for violations found during any incident investigation? (60106 States forward violations to PHMSA) (Yes= 1 point, No= 0 Points)</p> <p><b>Comments: NA. There have been no UNGS incidents. The process is in place.</b></p>	NA
7	<p>Did the State assist the Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents and investigate discrepancies) Chapter 6 (Yes= 1 point, No= 0 Points, NI= .5 point)</p> <p><b>Comments: NA. There have been no PHMSA requests to the UNGS Program. The process is in place.</b></p>	NA
8	<p>Does State share lessons learned from incidents with PHMSA? (Yes= 1 point, No= 0 Points)</p> <p><b>Comments: Yes. TRC shares incident reports during SW Region NAPSR Meetings.</b></p>	1

9	General Comments: Part E scored 5 of 5 points. Questions 3-7 were NA.	5
---	---	---

F – DAMAGE PREVENTION		
1	<p>Did the State inspector verify UNGS operators are following their written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? (API 1171 Section 11.10 Public Awareness and Damage Prevention) (Yes= 2 points, No= 0 Points, NI=1 Point)</p> <p><b>Comments: Yes. See Standard Operating Guidelines (SOG) Section 7.7.</b></p>	2
2	<p>Did the State encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (Common Ground Alliance Best Practices, support excavation damage prevention legislation, etc.) (Yes= 2 points, No= 0 Points, NI=1 Point)</p> <p><b>Comments: Yes. The TRC is active in many forms of Damage Prevention outreach, including Common Ground Alliance Meetings.</b></p>	2
3	<p><b>General Comments: Part F scored 4 of 4 points.</b></p>	4

G – FIELD INSPECTIONS		
1	Operator, Inspector, Location, Date and PHMSA Representative <b>Comments: Kinder Morgan Tejas Pipeline/Clearlake Gas Storage Facility, OPID 4900, Justin Markham, TRC Lead UNGS Inspector, 5200 GENOA RED BLUFF ROAD, PASADENA, TX 77505, 3/20-21/2023, Patrick Gaume. Mark Lay, TRC UNGS Program Manager, was also present. See Clearlake Gas Storage Facility Inspection 2023 GT in IA.</b>	
2	Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (Yes= 1 point, No= 0 Points) <b>Comments: Yes. 3 KM personnel were present, and 5 more KM personnel were present virtually</b>	1
3	Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: Yes. The TRC PIPES Program and IA were both used.</b>	2
4	Did the inspector thoroughly document results of the inspection? (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: Yes. Justin was moving through the questions in a steady and consistent manner.</b>	2
5	Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Yes= 1 point, No= 0 Points) <b>Comments: Yes. The portion observed was for Procedures and Records; Office space, Internet, and Electronic records were all made available for the inspection</b>	1
6	Did the inspector adequately review the following during the field portion of the State Program Evaluation? <ul style="list-style-type: none"> <li>• Procedures</li> <li>• Records</li> <li>• Field Activities/Facilities</li> <li>• Other (please comment)</li> </ul> (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: Yes. A full inspection was scheduled and was scheduled for Procedures, Records, and Observations (Field). The portion I witnessed was Procedures and Records.</b>	2
7	Did the inspector have adequate knowledge of the UNGS safety program and regulations? (Evaluator will document reasons if unacceptable) (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: Yes. Justin demonstrated knowledge of the UNGS safety program and regulations.</b>	2
8	Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) (Yes= 1 point, No= 0 Points) <b>Comments: Yes. Kinder Morgan was well prepared and responsive to all requests. No violations or concerns were found.</b>	1

[illegible]

H - 60106 AGREEMENT STATE (if applicable)		
1	<p>Did the State use the current federal inspection form(s)? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: H1-7; NA, not a 60106 Agreement Partner.</b></p>	NA
2	<p>Are results documented demonstrating inspection units were reviewed in accordance with State inspection plan? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: H1-7; NA, not a 60106 Agreement Partner.</b></p>	NA
3	<p>Were all probable violations identified by State referred to PHMSA for compliance action? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: H1-7; NA, not a 60106 Agreement Partner.</b></p>	NA
4	<p>Did the State immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: H1-7; NA, not a 60106 Agreement Partner.</b></p>	NA
5	<p>Did the State give written notice to PHMSA within 60 days of all probable violations found? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: H1-7; NA, not a 60106 Agreement Partner.</b></p>	NA
6	<p>Did the State initially submit adequate documentation to support compliance action by PHMSA on probable violations? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: H1-7; NA, not a 60106 Agreement Partner.</b></p>	NA
7	<p><b>General Comments: Part H is NA, not a 60106 Agreement Partner. Part H scored 0 of 0 points</b></p>	NA